

**Fill in this information to identify the case:**

|                                         |                      |             |              |
|-----------------------------------------|----------------------|-------------|--------------|
| Debtor 1                                | Tommy Lee Porter, II |             |              |
| Debtor 2                                | Malinda Marie Porter |             |              |
| (Spouse, if filing)                     |                      |             |              |
| United States Bankruptcy Court for the: | Middle               | District of | Pennsylvania |
| Case number                             | 17-00034 HWV         |             |              |

**Form 4100R**

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g) the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

**Court claim no. (if known):**

**Name of Creditor:** WELLS FARGO BANK, N.A.

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**Last 4 digits of any number you use to identify the debtor's account:** 3201

**Property address:** 120 Quince Street  
Number Street

Harrisburg, PA 17111  
City State ZIP Code

**Part 2: Prepetition Default Payments**

*Check one:*

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

*Check one:*

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 12/01/2021  
MM/DD/YYYY

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of the response is:

a. Total postpetition ongoing payments due:

(a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding:

+(b) \$ \_\_\_\_\_

c. **Total.** Add lines a and b.

(c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: \_\_\_\_\_

MM/DD/YYYY

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Debtor 1 Tommy Lee Porter, II Case number (if known) 17-00034 HWV  
First Name Middle Name Last Name

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts for the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amount the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box.*

I am the creditor.  
 I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

Print X /s/ Sarah K. McCaffery Date 11/30/2021  
Signature  
Jill Manuel-Coughlin, Esq. / Harry B. Reese, Esq. /  
Sarah K. McCaffery, Esq. Title Attorney  
First Name Middle Name Last Name

Company Powers Kirn, LLC

If different from the notice of address listed on the proof of claim to which this response applies:

Address 8 Neshaminy Interplex, Suite 215  
Number  Street   
Trevose, PA 19053  
City  State  ZIP Code

Contact phone 215-942-2090 Email [bankruptcy@powerskirn.com](mailto:bankruptcy@powerskirn.com)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

|                                                                              |           |                                       |
|------------------------------------------------------------------------------|-----------|---------------------------------------|
| IN RE:<br>Tommy Lee Porter, II<br>Malinda Marie Porter                       | Debtor(s) | Case No.: 17-00034 HWV<br>Chapter: 13 |
| WELLS FARGO BANK, N.A.<br>v.<br>Tommy Lee Porter, II<br>Malinda Marie Porter | Movant    |                                       |
|                                                                              |           | Respondent                            |

**CERTIFICATION OF SERVICE  
OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

I hereby certify under penalty of perjury that I served the above captioned parties at the address specified below or on the attached list on November 30, 2021.

The type of service made on the parties (first-class mail, electronic notification, hand delivery or another type of service) was service by electronic notification and first-class U.S. Mail.

Parties served via electronic notification:

Jack N. Zaharopoulos  
8125 Adams Drive, Suite A  
Hummelstown PA 17036  
dcook@pamdl3trustee.com  
Trustee

Kara Katherine Gendron, Esquire  
125 State Street  
Harrisburg, PA 17101  
karagendron@gmail.com  
Attorney for Debtor/Debtors

Parties served via First-Class Mail

Tommy Lee Porter, II  
120 Quince Street  
Harrisburg PA 17111  
Debtor

Malinda Marie Porter  
120 Quince Street  
Harrisburg, PA 17111  
Debtor

Dated: November 30, 2021

/s/ Sarah K. McCaffery

POWERS KIRN, LLC  
Jill Manuel-Coughlin, Esq.; Atty ID #63252  
Harry B. Reese, Esq.; Atty ID #310501  
Sarah K. McCaffery, Esq.; Atty ID #311728  
8 Neshaminy Interplex, Suite 215  
Trevose, PA 19053  
Phone: 215-942-2090; Fax 215-942-8661  
Email: [bankruptcy@powerskirn.com](mailto:bankruptcy@powerskirn.com)  
Attorneys for Creditor/Movant